

# **EXHIBIT A**

Court of Common Pleas of Philadelphia County  
Trial Division**Civil Cover Sheet**

For Prothonotary Use Only (Docket Number)

**JULY 2012****004606**

E-Filing Number: 1208003296

PLAINTIFF'S NAME SANTOSH LAL		DEFENDANT'S NAME TARGET CORPORATION	
PLAINTIFF'S ADDRESS 2737 SPRINGFIELD ROAD BROOMALL PA 19008		DEFENDANT'S ADDRESS 1000 NICOLET MALL TRPN 0945 MINNEAPOLIS MN 55403	
PLAINTIFF'S NAME		DEFENDANT'S NAME TARGET STORES, INC.	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS 1000 NICOLET MALL TRPN 0945 MINNEAPOLIS MN 55403	
PLAINTIFF'S NAME		DEFENDANT'S NAME TARGET CORPORATION T-1269	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS 2050 CHEMICAL ROAD PLYMOUTH MEETING PA 19462	
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NUMBER OF DEFENDANTS 3	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other:		
CASE TYPE AND CODE 2V - MOTOR VEHICLE ACCIDENT			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)		FILED <b>PRO PROTHY</b> <b>AUG 02 2012</b> <b>S. GARRETT</b>	
		IS CASE SUBJECT TO COORDINATION ORDER? YES    NO	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>SANTOSH LAL</u> Papers may be served at the address set forth below.			
NAME OF PLAINTIFFS/PETITIONER'S/APPELLANT'S ATTORNEY MARC I. SIMON		ADDRESS SIMON & SIMON, P.C. 1515 MARKET STREET SUITE 1910 PHILADELPHIA PA 19102	
PHONE NUMBER (215) 400-2251	FAX NUMBER (267) 639-9006		
SUPREME COURT IDENTIFICATION NO. 201798		E-MAIL ADDRESS matthewzamites@simonpc.com	
SIGNATURE OF FILING ATTORNEY OR PARTY MARC SIMON		DATE SUBMITTED Thursday, August 02, 2012, 11:59 am	

FINAL COPY (Approved by the Prothonotary Clerk)

THIS IS NOT AN ARBITRATION COMPLAINT  
AN ASSESSMENT OF DAMAGES HEARING IS  
REQUIRED



SIMON & SIMON, P.C.

By: Marc I. Simon, Esq.  
Matthew Zamites, Esq.  
Joshua A. Rosen, Esq.  
James Blumenthal, Esq.  
Alex Kroupa, Esq.

Attorneys for Plaintiff

Attorney I.D. Nos. 201798/82140/308825/89506/309425  
1515 Market Street, Suite 1910  
Philadelphia, PA 19102  
(215) 400-2251

Santosh Lal  
2737 Springfield Road  
Broomall, PA 19008  
Plaintiff

v.

Target Corporation  
1000 Nicolet Mall TRPN 0945  
Minneapolis, MN 55403

2050 Chemical Road  
Plymouth Meeting, PA 19462

and

Target Stores, Inc.  
1000 Nicolet Mall TRPN 0945  
Minneapolis, MN 55403

2050 Chemical Road  
Plymouth Meeting, PA 19462

and

Target Corporation T-1269  
2050 Chemical Road  
Plymouth Meeting, PA 19462  
Defendants

COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY

August Term, 2012

No.

JURY TRIAL DEMANDED

**NOTICE TO DEFEND**

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

**PHILADELPHIA BAR ASSOCIATION  
LAWYER REFERRAL AND  
INFORMATION SERVICE  
One Reading Center  
Philadelphia Pennsylvania 19107  
Telephone: (215) 238-1701**

**AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

**ASOCIACIÓN DE LICENCIADOS DE  
FILADELFA  
SERVICIO DE REFERENCIA E  
INFORMACIÓN LEGAL  
One Reading Center  
Filadelfia, Pennsylvania 19107  
Telefono: (215) 238-1701**

**COMPLAINT**

1. Plaintiff, Santosh Lal, is a resident of the Commonwealth of Pennsylvania with an address set forth in the caption of this Complaint.
2. Defendant, Target Corporation, is a corporate entity authorized to conduct business in the Commonwealth of Pennsylvania, and regularly conducts business in Philadelphia, with a business address listed in the caption of this Complaint, and which at all times material hereto was the owner, operator, maintainer, possessor, lessor, lessee and/or otherwise legally responsible for the care, control and safety of the premises located at 2050 Chemical Road, Plymouth Meeting, PA 19462, referred to hereinafter as "Defendants' premises."
3. Defendant, Target Corporation, is a corporate entity authorized to conduct business in the Commonwealth of Pennsylvania, and regularly conducts business in Philadelphia, with a business address listed in the caption of this Complaint, and which at all times material hereto was the owner, operator, maintainer, possessor, lessor, lessee and/or otherwise legally responsible for the care, control and safety of the "Defendants' premises."
4. Defendant, Target Stores, Inc., is a corporate entity authorized to conduct business in the Commonwealth of Pennsylvania, and regularly conducts business in Philadelphia, with a business address listed in the caption of this Complaint, and which at all times material hereto was the owner, operator, maintainer, possessor, lessor, lessee and/or otherwise legally responsible for the care, control and safety of the "Defendants' premises."
5. Defendant, Target Corporation T-1269, is a corporate entity authorized to conduct business in the Commonwealth of Pennsylvania, and regularly conducts business in Philadelphia, with a business address listed in the caption of this Complaint, and which at all times material

hereto was the owner, operator, maintainer, possessor, lessor, lessee and/or otherwise legally responsible for the care, control and safety of the "Defendants' premises."..

6. Defendants named in paragraphs 2 through 5 above will be collectively referred to as "Target" or "Defendants" for the entirety of this Complaint.

7. At all times material hereto, Defendants were acting individually, jointly and/or by and through its agents, servants, franchisees, workmen and/or employees for the maintenance, repair, care and control of the premises located at 2050 Chemical Road, Plymouth Meeting, PA 19462, referred to hereinafter as "Defendants' premises."

8. At all times material hereto, Defendants, individually, jointly and/or by and through their agents, servants, representatives and/or employees, acting within the scope of their agencies, were at all times material hereto the owner(s), operator(s), maintainer(s), possessor(s), lessor(s), lessee(s) and/or otherwise legally responsible for the care, control and/or safety of the premises.

9. At all times material hereto, defendants, was/were the owner(s), operator(s), lessor(s), lessee(s), maintainer(s), possessor(s), and/or otherwise responsible acting individually, jointly, and/or by and through his/her/their agents, servants, franchisees, workmen and/or employees for the maintenance, repair, care and control of the premises.

10. At all times relevant hereto, Defendants, individually, jointly and/or through its agents, servants, franchisees, workmen and/or employees, had a duty to keep and maintain the aforesaid premises in a reasonably safe condition for those persons lawfully thereon, including plaintiff, Santosh Lal.

11. On or about May 31, 2011, at approximately 9:15p.m., Plaintiff, Santosh Lal, was a business invitee, licensee and/or otherwise legally on defendant's premises.

12. At or about the same date and time, Plaintiff, Santosh Lal, was caused to slip and fall on a soda and/or liquid substance that was on the floor at the 2050 Chemical Road, Plymouth Meeting, PA 19462 premises, causing serious and permanent personal injuries on account of which this action is brought.

13. At or about the same date, time and place in question, and for some period of time prior thereto, Defendants, acting individually, jointly and/or by and through its agents, servants, franchisees, workmen and/or employees, negligently, recklessly and/or carelessly allowed and permitted dangerous and unsafe conditions to exist, including but not limited to, the conditions which directly resulted in the plaintiff's injuries.

14. As a result of this accident, the plaintiff suffered severe and permanent bodily injuries as more fully set forth at length below.

15. The negligence, carelessness, and/or recklessness of Defendants consisted of, inter alia, the following:

- (a) Failure to remove the soda and/or liquid substance from the floors;
- (b) Failure to regard the rights, safety and position of the Plaintiff in and about the area of the aforementioned accident;
- (c) Failure to request and supervise periodic inspections of the premises in and around the area where Plaintiff fell by Defendant's employees and/or agents.
- (d) Failure to reasonably inspect, maintain and/or otherwise exercise due and reasonable care under the circumstance in view of the foreseeable dangers, accidents and/or injuries that could occur as a result of the conditions on the premises.
- (e) Failure to comply with Philadelphia County and Commonwealth of Pennsylvania

building codes, county and city laws, ordinances and regulations pertaining to the design, construction and maintenance of the aforementioned premises.

- (f) Failure to provide sufficient warning to the Plaintiff as to the existence of the reasonably foreseeable defective, dangerous, and unsafe conditions giving rise to the instant action.
- (g) Failure to provide adequate safeguards to prevent the injury to Plaintiff.
- (h) Failure to exercise the proper care, custody and control over the aforesaid premises.
- (i) Failing to provide a suitable and/or proper safeguard or other floor covering and/or mat at and/or near the location of plaintiff's slip and fall to absorb soda and other liquid which was reasonably foreseeable to be spilled; and
- (j) Failing to prevent the soda and/or other liquid substance from spilling and remaining on the floor in a place where plaintiff and/or other business invitees would be likely to travel.

16. As a direct result of the negligence of defendant, as described hereinabove, the plaintiff suffered various serious and permanent personal injuries, serious and permanent impairment of bodily function and/or permanent disfigurement, and/or aggravation of pre-existing conditions.

17. As a result of these injuries, all of which are permanent in nature and all of which are to plaintiff's great financial detriment and loss, plaintiff has in the past, is presently and may in the future suffer great anguish, sickness and agony and will continue to suffer for an indefinite time into the future.

18. As an additional result of the carelessness, negligence and/or recklessness of the Defendants, Plaintiff has suffered emotional injuries, along with the physical injuries suffered.



19. As a further result of the Plaintiff's injuries, Plaintiff has in the past, is presently and may in the future undergo a great loss of earnings and/or earning capacity, all to plaintiff's further loss and detriment.

20. Furthermore, in addition to all the injures and losses suffered by the Plaintiff, Plaintiff has also incurred or will incur medical, rehabilitative and other related expenses in an amount equal to and/or in excess of any applicable health insurance coverage for which plaintiff has not been reimbursed and upon which the plaintiff makes a claim for payment in the present action.

WHEREFORE, Plaintiff, Santosh Lal, demands judgment in his favor and against Defendants, Target Corporation, Target Stores, Inc., and Target Corporation T-1269, in an amount in excess of Fifty Thousand (\$50,000.00) Dollars, plus all costs and other relief this court deems necessary.

SIMON & SIMON, P.C.

BY: \_\_\_\_\_/s  
Marc I. Simon, Esquire  
Matthew Zamites, Esquire  
Joshua Rosen, Esquire  
James Blumenthal, Esquire  
Alexander Kroupa, Esquire  
Simon & Simon, P.C.  
1515 Market Street  
Suite 1910  
Philadelphia, PA 19102  
215-400-2251  
*Attorney for Plaintiff*

**VERIFICATION**

I, Marc I. Simon, Esquire, hereby state that I am the attorney for the Plaintiff in the within action and that the facts set forth in this Civil Action Complaint above are true and correct to the best of my knowledge, information and belief.

I understand that the statements in this Verification are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

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Marc I. Simon